

1 Jodie Berger (SBN 124144)

jberger@wclp.org

2 Richard Rothschild (SBN 67356)

rrothschild@wclp.org

3 Robert Newman (SBN 86534)

rnewman@wclp.org

4 Antionette Dozier (SBN 244437)

adozier@wclp.org

5 **WESTERN CENTER ON LAW & POVERTY**

3701 Wilshire Blvd., Suite 208

6 Los Angeles, CA 90010

T: (213) 235-2617

7 F: (213) 487-0242

8 Lindsay Nako (SBN 239090)

lnako@impactfund.org

9 Lori Rifkin (SBN 244081)

lrifkin@impactfund.org

10 Fawn Rajbhandari-Korr (SBN 315888)

fkorr@impactfund.org

11 Meredith Dixon (SBN 346864)

mdixon@impactfund.org

12 **IMPACT FUND**

2080 Addison St., Suite 5

13 Berkeley, CA 94704

T: (510) 845-3473

14 F: (510) 845-3654

15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 ANIKA OKJE ERDMANN-BROWNING  
19 and JACQUELINE BENITEZ, individually  
20 and on behalf of all others similarly situated,

21 Plaintiffs,

22 v.

23 THOMAS J. VILSACK, Secretary of the  
24 United States Department of Agriculture,  
25 in his official capacity; SHALANDA  
26 YOUNG, Director of the United States  
Office of Management and Budget, in her  
official capacity.

27 Defendants.

Case No.: 4:23-cv-04678-JST

CLASS ACTION

**DECLARATION OF JONETTA HALL  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

Hearing date: March 14, 2024

Time: 2:00 p.m.

Action filed: September 12, 2023

**DECLARATION OF JONETTA HALL**

I, Jonetta Hall, declare as follows.

1. I have personal knowledge of the facts in this declaration and am competent to testify to them.

2. I am 48 years old and single.

3. I live in Sacramento, California with my daughter, who is 16 years old.

4. I work as an In Home Supportive Services provider. I get cash aid for my daughter.

5. My rent, utilities, car payment and car insurance take up all my cash. I have no food budget more than what I can buy with CalFresh.

6. I was getting about \$400 in CalFresh until November 2023. I now get \$535. My next renewal will be the end of 2024.

7. I have been diagnosed as pre-diabetic and overweight, and my doctor advised that I need to eat a diet of fresh produce. My daughter was diagnosed with allergies and stomach lining/bowel issues. If her stomach gets irritated, she throws up. The doctor says she is to eat healthy foods, not junk food or sugars. Fresh produce is really expensive though, and I'm not supposed to eat many foods that are less expensive to buy, like noodles and rice. In mid-February, I bought collard greens, squash and four zucchinis, that should last me a week. That was about \$100, and then I bought some cheap frozen meals and some canned food. I buy the frozen because it's less expensive than the fresh food I should be eating, and I have to stay within what I can get with CalFresh.

8. My daughter can get lunch at her school, but she often can't eat it because it makes her sick. She complains when she comes home that she is so hungry. I sometimes skip meals so she could eat.

9. My food stamps stopped at the end of November. I appealed, and I got my food stamps for both December 2023 and January 2024 at the end of January 2024.

10. Having no food stamps for those two months was really hard. I tried y to keep some beans and cans for the end of the month if the food stamps run out. I don't have a freezer,

1 though, and have to borrow my cousin's freezer. So I can't save up on those foods. When my  
2 food stamps stopped, I went through the canned food I had, after the fridge was empty and I  
3 didn't have anything, not even condiments. I went through everything in the cupboard. My  
4 friend helped me a bit, but he is low income too, and that was taking away from his food. The  
5 same with my cousin. She is on food stamps herself, but gave me a bit of hamburger meat, that  
6 we made last two meals. I went to food banks three times. I had to go to three different places,  
7 because they have a limit on how much you can get from them. I got some chicken at one food  
8 bank, but when I cooked it up and ate it, it didn't taste right and I got sick, so had to throw it all.  
9 We also got some vegetables and fruit and bread. Some of the fruit was very ripe, and some I  
10 had to eat right away before they went bad, so I couldn't make that last. I couldn't save the  
11 bread long as it started going bad too.

12 11. I know about the problem with there being no government budget for food stamps  
13 yet, and that there now is only short term money for the program. I worry about what will happen  
14 if something happens to my stamps again. It's hard and stressful to think about all that.

15 12. Because I went without CalFresh for a couple months, when I got my food stamps  
16 back in January, I had to replace everything, so I couldn't buy extra like storing up on canned  
17 food. For February, I want to try to save for emergencies, like if the stamps end, but prices have  
18 gone up and now it's hard to get more than what we need for the month.

19 13. I already eat small portions, especially with trying to make sure my daughter has  
20 enough, and I am hungry at night. My daughter gets sick if she eats too much dairy. If she has  
21 some in the morning, she usually can't eat the school lunch at they mostly have dairy in it. So  
22 usually I have to pack her a lunch and can't save by counting on a school meal.

23 14. We try to go to a church on Sunday where we can get a meal. And sometimes, I  
24 buy a snack to hold me over, instead of having a meal.

25 15. If I try to save up to have some backup food, I have to eat even less. I drink water  
26 to fill up when my stomach is grumbling and then try to sleep so I don't think about it.

27 ///

28 ///

1 I hereby declare under penalty of perjury under the laws of under the laws of the United  
2 States of America that the foregoing is true and correct.

3 Executed on 2/27/2024, 2024, in Sacramento, Sacramento County.

4 DocuSigned by:

5 *Jonetta Hall*

6 0020D0F32A354CF...

7 Jonetta Hall